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***Class Counsel***

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

KIM ALLEN, LANIE RIDEOUT, and  
KATHLEEN HAIRSTON, all others  
similarly situated, and the general  
public,

Plaintiffs,

SIMILASAN CORPORATION,

Defendant

Case No.: 3:12-cv-00376-BAS-JLB

**CLASS ACTION**

Filed: February 10, 2012

**DECLARATION OF DEBORAH S. DIXON IN SUPPORT OF JOINT MOTION FOR AN ORDER (1) GRANTING PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, (2) CERTIFYING SETTLEMENT CLASS, (3) APPOINTING CLASS REPRESENTATIVES AND CLASS COUNSEL, (4) APPROVING NOTICE PLAN, AND (5) SETTING FINAL APPROVAL HEARING**

Hearing: May 2, 2016  
Judge: Hon. Cynthia A. Bashant  
Courtroom: 4B

1 I, Deborah S. Dixon, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California, and I am  
3 a Senior Trial Attorney with Gomez Trial Attorneys, trial counsel for Plaintiffs Lanie  
4 Rideout and Kathleen Hairston and the putative class members ("Plaintiffs"). I have  
5 personal knowledge of the facts set forth in this declaration.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of relevant resume  
7 information for John Gomez, owner of Gomez Trial Attorneys, and myself.

8 3. I attended University of California, Santa Barbara, graduating in 2003. I  
9 graduated from California Western School of Law in January 2007 and have been in  
10 good standing with the California State Bar since June 2007. I was an associate in the  
11 business litigation and commercial litigation departments at Wingert Grebing Brubaker  
12 & Juskie from 2007 until 2012, when I was elevated to partner. During my tenure at  
13 Wingert Grebing Bruabaker & Juskie, I handled, and eventually managed, complex  
14 multi-party litigation, including consumer claims and products liability. I participated in  
15 prosecuting and defending hundreds of disputes during litigation through settlement,  
16 trial and appeals.

17 4. In January 2015, I joined Gomez Trial Attorneys Complex Litigation  
18 department, where I manage the class action practice. Gomez Trial Attorneys has 22  
19 attorneys in three different offices and a total staff of 48. We are well equipped to  
20 handle complex litigation.

21 5. John Gomez and I co-tried a multi-week federal class action trial with  
22 similar issues presented in this case against a different national homeopathic  
23 manufacturer in *Allen v. Hyland's, Inc.*, United States District Court, Central District,  
24 Western Division Case No. 12-cv-1150-DMG-MAN before Hon. Dolly M. Gee.

25 6. John Gomez and I are class counsel in *Union Square at Broadway*  
26 *Homeowners Association v. Western Pacific Housing-Broadway, et al.*, San Diego  
27 Superior Court Case No. 37-2011-0091935-CU-CD-CTL before Hon. Ronald L. Styn.



1 That case is scheduled for trial on April 1, 2016 and Mr. Gomez and I are lead trial  
2 counsel.

3 7. I was primarily responsible for settling similar allegations and claims in  
4 *Wood v. Nature's Way*, case No.: 2:13-cv-06591-TJH(OPx), which was pending in  
5 United States District Court, Central District.

6 8. John Gomez and I are trial counsel for the putative class in *In re Sony Vaio*  
7 *Computer Notebook Trackpad Litigation*, United States District Court, Southern District  
8 of California, Case No. 09-cv-02109-BAS-MDD.

9 9. Our firm participated as counsel for class members in the *Corona v. Sony*  
10 *Pictures Entertainment Inc.* data breach case before the United States District Court,  
11 Central District ; Case No. 2:14-CV-09600-RGK-E.

12 10. Our firm is actively prosecuting several other class actions based on  
13 consumer protection claims, as well as product liability claims.

14 11. I participated in both of the settlement conferences before Judge Jill  
15 Burkhardt. I was the primary attorney from October through the present working with  
16 Similasan's counsel, Michelle Gillette, in finalizing this settlement agreement and the  
17 terms therein.

18 12. In my experienced judgment, the proposed settlement is fair, reasonable,  
19 and adequate with respect to Plaintiffs and the certified classes: Without the Settlement  
20 Agreement, Similasan would not be obligated to change its labeling to provide more  
21 consumer information. In addition I am aware of the risk of a defense verdict on  
22 damages given my experience in the *Allen v. Hyland's, Inc.* case.

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Deborah S. Dixon